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Site: West Lake LDF
ID: MBD07990932
Elev: 3.5
O.Let: 002
3-2-95
0714

MAR 0 2 1995

Michael D Hockley Esq
Spencer Fane Britt & Browne
1400 Commerce Bank Building
1000 Walnut Street
Kansas City, Missouri 64106

Dear Mr Hockley

I have completed my review of the Draft Remedial Investigation/Feasibility Study Work Plan West Lake Land Fill Operable Unit 2. The entire document appears to be biased toward the selection of the presumptive remedy for landfills as the remedial alternative for the site. In fact there is a good probability that the presumptive remedy will be the one chosen as appropriate for this site. However, the Remedial Investigation should be conducted to completely characterize the site while ensuring that sufficient information is gathered to support the implementation of the presumptive remedy should it be chosen. It is not necessary to have the work plan revised, however, I want to emphasize that it is not a foregone conclusion that the presumptive remedy for landfills will be selected for this site.

The following are my review comments:

1. The last sentence of section 2.2.3.1.6 on page 2.13 appears to be missing something and should be completed.
2. In section 2.4.3.1 on page 2.33 the next to the last paragraph which states that the industrial waste is not subject to management as hazardous waste leaves an impression that is incorrect and should be corrected. Perhaps the addition of the phrase "under RCRA" should be added to the end of the sentence.
3. For completeness the owners of Operable Unit 01 Areas 1 & 2 should be added to figure 2.18.

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4 Section 5.2.6 discusses the determination of seep locations and sampling. There is no discussion of how the seeps will be identified and what criteria will be used to define a seep. Will the survey be ongoing or a one time shot? Will the survey look at wet weather seeps or those which are more or less perennial?

5 Section 5.2.6 further discusses the collection of one surface water and sediment sample from the Earth City retention pond. How will the location of those samples be selected? It is important that the location selected is representative of the potential for contamination resulting from the proximity to the landfill.

I am in general satisfied with the work plan and its contents. However, there are some remaining issues. Specifically, the work plan is to be the document that directs all aspects of the work to be accomplished during the RI/FS. The document presented does not do that; it only gives the general approach that is to be used in the project. I understand the economies to be achieved by following on with the work for OU1. At the same time, I am unable to state with certainty that the work plan specifically addresses everything that it should. I consider the work plan submitted as an umbrella document which will cover subsequent documents that will fill in the details. I expect subsequent submissions, such as the Field Sampling and Analysis Plan, to contain greater level of detail. I expect that there will be written procedures that will provide clear, concise directions concerning every aspect of the RI/FS. Specific references to methods and guidance procedures will be necessary rather than statements that EPA guidance will be followed.

Sincerely,

Steven E. Kinser
Remedial Project Manager
Superfund Branch
Superfund Division

cc Ward E. Herbst, CPHG, CEM
Program Director Hydrogeology
Golder Associates Inc.
200 Union Boulevard
Suite 500
Lakewood, Colorado 80228



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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KANSAS CITY KANSAS 66101

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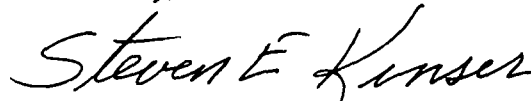
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